

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 21-cr-00207

Hon. David Cleveland Joseph

CRYSTAL MARIE HAWORTH,

Defendant.

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**DEFENDANT'S UNOPPOSED MOTION TO CONTINUE TRIAL**

Defendant Crystal Marie Haworth, by her counsel, moves to continue all remaining dates by 14 days. The trial date is currently set for March 6, 2023. Both parties have already filed notices of expert testimony before the January 19, 2023 deadline. Ms. Haworth seeks to continue all remaining deadlines. Motions in limine and responses are currently due January 19, 2023; foreseeable issues, jury instructions, voir dire, and trial briefs are due by February 3, 2023; and the plea deadline is February 10, 2023. (Dkt. #61) Counsel seek a 14-day continuance to facilitate resolution of this case. The Government has no objection to continuing these dates.

On December 28, 2022, counsel for both parties spoke by phone to discuss a resolution. The government counsel extended a verbal offer but had not yet drafted the agreement and obtained supervisor approval. Defense counsel discussed the

proposal with Ms. Haworth on December 29, 2022. The government provided a draft plea agreement on January 6, 2023, which counsel reviewed in person with Ms. Haworth that same day and again on January 7, 2023. On January 6, 2023, defense counsel also received additional discovery from the government.

On January 11, 2023, defense counsel sent an email to government counsel outlining concerns and posing questions. The government responded to those questions and sent a new plea agreement on January 19, 2023. That same day, defense counsel sent Ms. Haworth a copy of the agreement and worked quickly to schedule a video visit with Ms. Haworth. More than one visit may be necessary; however, both defense counsel will be unavailable January 25–28, 2023, because they are presenting at and attending an out-of-state training.

An adjournment of the deadlines will facilitate plea negotiations by allowing the parties to focus on the proposed resolution and conserving resources. Counsel has advised Ms. Haworth of her right to a speedy trial under the Speedy Trial Act. She wants time to review the agreement with counsel and ask questions. Ms. Haworth is therefore waiving her right to a speedy trial under the Speedy Trial Act.

In light of the foregoing, proceeding with the current motions deadline and trial date as scheduled would prejudice Ms. Haworth. The Government has no objection to continuing the schedule. Proceeding with the current deadlines would prejudice Ms. Haworth by rushing an important decision.

## CONCLUSION

Ms. Haworth requests that the Court extend the trial and other dates by 14 days.

Date: January 20, 2023

Respectfully submitted,

**FEDERAL PUBLIC DEFENDER  
WESTERN DISTRICT OF WASHINGTON**

/s/Colleen P. Fitzharris  
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**CERTIFICATE OF SERVICE**

I hereby certify that on January 20, 2023, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification to opposing counsel.

Respectfully Submitted,

**FEDERAL PUBLIC DEFENDER  
WESTERN DISTRICT OF WASHINGTON**

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